

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

<p>In re:</p> <p>INTEGRATED HEALTH SERVICES, INC., <i>et al.</i>,</p> <p style="text-align: center;">Debtors.</p> <hr/> <p>IHS LIQUIDATING LLC,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>ACE INDEMNITY INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY OF NORTH AMERICA,</p> <p style="text-align: center;">Defendant.</p> <hr/> <p>IHS LIQUIDATING LLC,</p> <p style="text-align: center;">Third-Party Plaintiff,</p> <p style="text-align: center;">v.</p> <p>NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA., GENERAL STAR INDEMNITY COMPANY, and ACE INDEMNITY INSURANCE COMPANY f/k/a INDEMNITY INSURANCE COMPANY OF NORTH AMERICA,</p> <p style="text-align: center;">Third-Party Defendants.</p>	<p>Chapter 11</p> <p>Case No. 00-389 (MFW)</p> <p>(Jointly Administered)</p> <p>CIVIL ACTION No. 05-736 (GMS)</p>
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STIPULATED BRIEFING SCHEDULE

WHEREAS on May 6, 2005, IHS Liquidating LLC (the "Plaintiff") filed a *Complaint for Declaratory Relief, Breach of Contract and Bad Faith in the United States Bankruptcy Court for the District of Delaware against Ace Indemnity Insurance Company f/k/a Indemnity Insurance Company of North America ("IICNA")*

WHEREAS on May 13, 2005, IICNA filed *A Motion to Withdraw the Reference and Motion for Determination Whether the Proceeding is Core*.

WHEREAS on June 8, 2005. The *Motion to Withdraw the Reference* was docketed with The United States District Court for the District of Delaware.

WHEREAS on July 26, 2005, *IICNA filed an Answer and Counterclaim to Plaintiff's Complaint*

WHEREAS on August 18, 2005, *Plaintiff filed a Reply to the Counterclaim and a Third Party Complaint against National Union Fire Insurance of Pittsburgh, PA ("AIG") and General Star Indemnity Company ("GenStar")*

WHEREAS on September 19, 2005, *IICNA filed its Answer and Affirmative Defenses to the Third Party Complaint*

WHEREAS on December 12, 2005, *Plaintiff filed a Motion for Partial Summary Judgment seeking Summary Judgment as to Count I of its Complaint*

WHEREAS on March 14, 2006, This Honorable Court Withdrew the Reference.

WHEREAS on March 22, 2006, *IICNA filed its Response to Plaintiff's Motion for Partial Summary Judgment*

WHEREAS the Parties have agreed, that a briefing schedule other than the default provisions contained in D Del. LR 7.1.2 should be entered with respect to Plaintiff's Motion for Partial Summary Judgment as the issues are complex and the matter was recently withdrawn to this Honorable Court. The Plaintiff had already granted IICNA a significant extension to

respond to the Motion while the parties discussed the various issues involved in the matter. The Plaintiff merely seeks a brief extension to file its Reply Brief.

WHEREFORE the parties agree that, pursuant to the attached order, the following briefing schedule shall be entered:

The Plaintiff's Reply Brief is due on or before April 14, 2006.

<p>BIFFERATO, GENTILOTTI, BIDEN & BALICK, LLC</p> <p><i>[Signature]</i> (#4272) 2/6/06</p> <p>Garvan F. McDaniel (#4167) Buckner Building 1308 Delaware Avenue Wilmington, Delaware 19899 (302) 429-1900</p> <p>-and-</p> <p>KAYE SCHOLER LLP Arthur Steinberg Marc D. Rosenberg Ana Alfronso 425 Park Avenue New York, New York 10022-3598 (212) 836-8000</p> <p>-and-</p> <p>TROUTMAN SANDERS LLP Lee W. Stremba Clement H. Berne Michelle L. Abruzzo The Chrysler Building 405 Lexington Avenue New York, New York 10174 (212) 704-6000</p> <p>Attorneys for IHS Liquidating LLC</p>	<p>STEVENS & LEE, P.C.</p> <p><i>[Signature]</i></p> <p>Thomas G. Whalen, Jr. (#4034) 1105 North Market Street, 7th Floor Wilmington, DE 19801 (302) 425-3304</p> <p>-and-</p> <p>Leonard P. Goldberger, Esquire 1818 Market Street, 29th Floor Philadelphia, PA 19103 Telephone: (215) 864-7000 Telecopier: (215) 864-7123 E-mail: lpg@stevenslee.com</p> <p>-and-</p> <p>Francis J. Deasey, Esquire Gerald J. Valentini, Esquire Ward A. Rivers, Esquire (Members of PA Bar) DEASEY, MAHONEY & BENDER, LTD</p> <p>Attorneys for Indemnity Insurance Company of North America</p>
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SO ORDERED this _____ day of _____, 2006.

United States District Court Judge